

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

VALENE REED, individually and on)	
behalf of all others similarly situated,)	Civil Action No. 10-cv-5642 (DLC)
)	
Plaintiff,)	
)	
v.)	
)	
CONTINENTAL GUEST SERVICES)	Filed Electronically
CORPORATION,)	
)	
Defendant.)	
)	

**PLAINTIFF’S MOTION FOR AWARD OF ATTORNEYS’ FEES, REIMBURSEMENT
OF EXPENSES AND PAYMENT OF PLAINTIFF INCENTIVE AWARD**

Plaintiff, Valene Reed, hereby moves this Court for an award of attorneys’ fees, reimbursement of expenses and payment of Plaintiff incentive award. In support thereof, Plaintiff states as follows:

1. This class action was filed on July 26, 2010, on behalf of Plaintiff and a class of consumers against Continental Guest Services Corporation (“CGS” or “Defendant”).
2. The Complaint alleges that CGS violated the Fair and Accurate Credit Transaction Act, 15 U.S.C. § 1681 *et seq.* (“FACTA”).
3. CGS has at all times denied, and continues to deny, that it has committed any unlawful acts whatsoever or that it has any liability whatsoever to Plaintiff or the Class.
4. The total lodestar and costs incurred by Counsel for Plaintiff and the Class are \$119,845.46.¹

¹ See Declaration of R. Bruce Carlson In Support of Motion for Attorneys’ Fees, Costs and Plaintiff’s Incentive Award attached as Exhibit 1.

5. As set forth more fully in the accompanying Memorandum of Law, Plaintiff is applying for fees and costs in the amount of \$74,000.00, consistent with the specific terms of the Settlement Agreement. The requested fees and costs of \$74,000.00 represents a significant discount from the total lodestar and costs incurred by Class Counsel.

6. Plaintiff is also applying for a reasonable and appropriate incentive payment of \$1,500.00 in recognition of his effort on behalf of the Class. CGS has agreed to make this payment as is set forth in the Settlement Agreement.

WHEREFORE, Plaintiff respectfully requests that he be awarded reasonable attorneys' fees and costs in an amount of \$74,000.00 consistent with the specific terms of the Settlement Agreement plus an incentive payment of \$1,500.00.

Respectfully submitted,

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